

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:

Surina Lynn Brown

Debtor(s).

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Case No. 14-11710
(Chapter 7)

**DEBTOR'S AMENDED OBJECTION TO FREEDOM MORTGAGE CORP'S
MOTION FOR RELIEF FROM THE STAY AND BRIEF IN
SUPPORT WITH NOTICE OF HEARING**

The Debtor, SURINA LYNN BROWN, through counsel, AARON D. COMPTON, objects to Freedom Mortgage Corp.'s Motion for Relief from Automatic Stay and Abandonment Of Property [Doc.56] filed 08/17/2015 and moves this Court for an Order to Denying Movant's Motion and is support thereof states the following:

1. The Debtor converted her case from a Chapter 13 to a Chapter 7 because she was unable to make her plan payments. Debtor lost her Worker's Compensation coverage and is unable to work due to a catastrophic and progressive medical disability.
2. Debtor has asked her Mortgage Company to consider modifying her loan under HAMP and submitted the necessary documents on July 20, 2015. Debtor has sought a status update from the mortgage company individually and through her attorney. To date, all requests for status of her application have been denied.
3. Debtor denies that the Movant will suffer irreparable injury.
4. Lifting the stay on this Debtor would create a hardship on the Debtor. The Debtor does not have the physical or financial ability to move or relocate. This Objection was drafted and filed pro bono.
5. The Debtor has insured the property against loss.
6. The Debtor has equity in the property.

WHEREFORE, Debtor, respectfully requests this Court enter an order denying the Motion of Freedom Mortgage Corp for Relief from Automatic Stay and Abandonment Of Property as requested herein and grant such additional relief as this Court deems equitable.

/s/ Aaron D. Compton

Aaron D. Compton OK Bar No. 31968
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ATTORNEY FOR DEBTOR

NOTICE OF HEARING

Notice is hereby given that the hearing on this matter will be held on September 15, 2015 at 2:30 p.m. before Judge Janice Loyd in the second floor courtroom of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102.

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August, 2015, a true and correct copy of this Objection was electronically served using the CM/ECF system. I further certify that on this 28th day of August, 2015, a true and correct copy of this Motion was forwarded first class U.S. Mail, postage pre-paid and properly addressed to the following:

Joel C. Hall , 210 Park Ave, 3030 Oklahoma Tower, Oklahoma City, OK 73102
Jim Timberlake, 4200 Perimeter Center, Ste 100, Oklahoma City, OK 73112

/s/ Aaron D Compton

Aaron D. Compton